

EXHIBIT A

Supreme Court of Pennsylvania

2024-C-0332 /s/JW

Court of Common Pleas Civil Cover Sheet

LEHIGH

County

For Prothonotary Use Only:

Docket No:

TIME STAMP

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

Commencement of Action:

- ☒ Complaint ☐ Writ of Summons ☐ Petition
☐ Transfer from Another Jurisdiction ☐ Declaration of Taking

Lead Plaintiff's Name:
JOHN ANNONI

Lead Defendant's Name:
ALLENTOWN SCHOOL DISTRICT

Are money damages requested? ☒ Yes ☐ No

Dollar Amount Requested: ☐ within arbitration limits
☒ outside arbitration limits
 (check one)

Is this a Class Action Suit? ☐ Yes ☒ No

Is this an MDJ Appeal? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney: Edwin L. Stock, Esquire Attorney ID: #43787

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

- ☐ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☐ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☐ Other:

CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other

☒ Employment Dispute:
 Discrimination
☐ Employment Dispute: Other

☐ Other:

CIVIL APPEALS

- Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other

☐ Zoning Board
☐ Other:

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other:

REAL PROPERTY

- ☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other:

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations
 Restraining Order
☐ Quo Warranto
☐ Replevin
☐ Other:

PROFESSIONAL LIABILITY

- ☐ Dental
☐ Legal
☐ Medical
☐ Other Professional:

SECTION B

NOTICE

Pennsylvania Rule of Civil Procedure 205.5. (Cover Sheet) provides, in part:

Rule 205.5. Cover Sheet

(a)(1) This rule shall apply to all actions governed by the rules of civil procedure except the following:

- (i) actions pursuant to the Protection from Abuse Act, Rules 1901 et seq.
- (ii) actions for support, Rules 1910.1 et seq.
- (iii) actions for custody, partial custody and visitation of minor children, Rules 1915.1 et seq.
- (iv) actions for divorce or annulment of marriage, Rules 1920.1 et seq.
- (v) actions in domestic relations generally, including paternity actions, Rules 1930.1 et seq.
- (vi) voluntary mediation in custody actions, Rules 1940.1 et seq.

(2) At the commencement of any action, the party initiating the action shall complete the cover sheet set forth in subdivision (e) and file it with the prothonotary.

(b) The prothonotary shall not accept a filing commencing an action without a completed cover sheet.

(c) The prothonotary shall assist a party appearing pro se in the completion of the form.

(d) A judicial district which has implemented an electronic filing system pursuant to Rule 205.4 and has promulgated those procedures pursuant to Rule 239.9 shall be exempt from the provisions of this rule.

(e) The Court Administrator of Pennsylvania, in conjunction with the Civil Procedural Rules Committee, shall design and publish the cover sheet. The latest version of the form shall be published on the website of the Administrative Office of Pennsylvania Courts at www.pacourts.us.

JOHN ANNONI

Plaintiff

v.

ALLENTOWN SCHOOL DISTRICT

Defendant

: IN THE COURT OF COMMON PLEAS OF
: LEHIGH COUNTY, PENNSYLVANIA

: CIVIL ACTION – LAW

: No.

: JURY TRIAL DEMANDED

**NOTICE TO DEFEND
NOTIFICACION PARA DEFENDERSE**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyers' Referral Service of the
Lehigh County Bar Association
1114 W. Walnut Street
Allentown, Pennsylvania 18102
Telephone (610) 433-7094
www.lehighbar.org

AVISO

Le han demandado a usted en el tribunal. Si usted quiere defenderse de las demandas expuestas en las páginas siguientes, usted debe tomar acción en el plazo de veinte (20) días a partir de la fecha en que se le hizo entrega de la demanda y la notificación, al interponer una comparecencia escrita, en persona o por un abogado y registrando por escrito en el tribunal sus defensas o sus objeciones a las demandas en contra de su persona. Se le advierte que si usted no lo hace, el caso puede proceder sin usted y podría dictarse un fallo por el juez en contra suya sin notificación adicional y podría ser por cualquier dinero reclamado en la demanda o por cualquier otro reclamo o desagravio en la demanda solicitado por el demandante. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

USTED DEBE LLEVARLE ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O NO PUEDE CORRER CON LOS GASTOS DE UNO, VAYA O LLAME POR TELEFONO A LA OFICINA EXPUESTA ABAJO. ESTA OFICINA PUEDE POVEERLE INFORMACION RESPECTO A COMO CONTRATAR A UN ABOGADO.

SI NO PUEDE CORRER CON LOS GASTOS PARA CONTRATAR A UN ABOGADO, ESTA OFICINA PUDIERA PROVEERLE INFORMACION RESPECTO A INSTITUCIONES QUE PUEDAN OFRECER SERVICIOS LEGALES A PERSONAS QUE CALIFICAN PARA LA REDUCCION DE HONORARIOS O QUE NO TENGAN QUE PAGAR HONORARIOS.

Servicio de Recomendación para Contratar Abogados del
Colegio de Abogados del Condado Lehigh
1114 W. Walnut Street
Allentown, Pennsylvania 18102
Teléfono (610) 433-7094
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RICK STOCK LAW

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Facsimile (484) 930-0729

Attorneys for Plaintiff

JOHN ANNONI

Plaintiff

v.

ALLENTOWN SCHOOL DISTRICT

Defendant

: IN THE COURT OF COMMON PLEAS OF
: LEHIGH COUNTY, PENNSYLVANIA

:
: CIVIL ACTION – LAW

:
: No.

: JURY TRIAL DEMANDED
:

CIVIL ACTION COMPLAINT

AND NOW comes Plaintiff, John Annoni, by and through his counsel, Edwin L. Stock, Esquire, and Stock Law, LLC, and avers the following facts and causes of action:

1. Plaintiff, John Annoni, is an adult individual, who resides at 980 Lawrence Way, Allentown, PA 18104.
2. Defendant, Allentown School District, is a Pennsylvania school district, with an office at 31 S. Penn Street, Allentown, PA 18103.
3. Plaintiff, John Annoni, is a male.
4. Plaintiff, John Annoni, was hired as a teacher by Defendant, Allentown School District, on or about September 1, 1989.

BACKGROUND

5. On or about August 31, 2021, Plaintiff, John Annoni, was employed by Defendant, Allentown School District as a teacher at Trexler Middle School.

6. On or about August 31, 2021, Plaintiff, John Annoni, was informed by Robert Morrow, the Principal of Trexler Middle School, that in March 2020, approximately one and one-half years earlier, two female employees of Allentown School District who worked at Trexler Middle School, allegedly had received inappropriate text messages from Plaintiff, John Annoni, and that complaints had been filed against him.

7. Plaintiff, John Annoni, never sent any inappropriate texts to any female employees of Allentown School District and Plaintiff, John Annoni, informed his Principal, Robert Morrow of this.

8. Nonetheless, Mr. Morrow informed Plaintiff, John Annoni, that an investigation was being conducted regarding the complaints lodged against Plaintiff, John Annoni.

9. As of August 31, 2021, Defendant, Allentown School District, maintained a policy entitled "Unlawful Harassment". This policy required:

- (a) complaints of harassment to be reported "as soon as possible";
- (b) an impartial, thorough and confidential investigation of the alleged harassment be undertaken; and
- (c) preparation of a written report within 15 days, unless additional time to complete the investigation is required.

10. Throughout the Fall of 2021, Plaintiff, John Annoni, respectfully inquired of his Principal, Robert Morrow, about the investigation and the report and repeatedly was given no information, including a report.

11. Defendant, Allentown School District, has alleged that on December 31, 2021, Anthony Pidgeon, the Defendant's head of Human Resources, contacted Plaintiff, John Annoni, by letter and told Plaintiff, John Annoni, that the evidence collected supported the allegations against him.

12. Plaintiff, John Annoni, never received a purported letter dated December 31, 2021 from Anthony Pidgeon and in fact Plaintiff, John Annoni, has never seen such a purported letter.

13. Plaintiff, John Annoni, never received any form of discipline on or around December 31, 2021.

FACT WHICH SUPPORT CAUSE OF ACTION

14. On April 21, 2022, Plaintiff, John Annoni, was placed on administrative leave by Defendant, Allentown School District, allegedly because another unfounded complaint had been made against him by another female employee who claimed she received inappropriate texts from Plaintiff, John Annoni.

15. Plaintiff, John Annoni, was on administrative leave from April 21, 2022 to May 26, 2022.

16. On or about May 26, 2022, Plaintiff, John Annoni, was returned to work at Defendant, Allentown School District, as a substitute teacher and placed at another school within the Allentown School District for the remainder of the 2021 – 2022 school year.

17. Defendant, Allentown School District, has alleged that in or about August 2022 it "no longer believed Mr. Annoni to be the person responsible for sending the text messages at issue in 2020", although Plaintiff, John Annoni, has not ever been provided anything in writing by Defendant, Allentown School District regarding such.

COUNT I

VIOLATION OF PENNSYLVANIA HUMAN RELATIONS ACT

18. Plaintiff, John Annoni, incorporates the averments of the preceding paragraphs of this Complaint as if more fully set forth.

19. Defendant, Allentown School District violated the Pennsylvania Human Relations Act (PHRA), 43 P.S. §951 et seq.

20. Plaintiff, John Annoni, was treated differently because of his gender because Defendant, Allentown School District, placed Plaintiff, John Annoni, on Administrative Leave presuming that as a male that he was harassing female employees of Allentown School District.

21. Defendant, Allentown School District's, discriminatory actions toward Plaintiff, John Annoni, caused significant mental anguish and distress.

22. Plaintiff, John Annoni, due to the aforesaid, was initially denied the opportunity to teach summer school during the Summer of 2022, and had to fight to get this work. Plaintiff was denied the opportunity to participate in extracurricular paid opportunities for the 2021 – 2022 school year, to his financial detriment.

23. Plaintiff, John Annoni, believes and therefore avers that because of the presumption of responsibility which Defendant's actions placed on him that he suffered significant and possibly irrevocable damage to his reputation within the Allentown School District and the community at large.

WHEREFORE, Plaintiff demands judgment against Defendant for an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT II

VIOLATION OF THE CIVIL RIGHTS ACT

24. Plaintiff, John Annoni, incorporates the averments of the preceding paragraphs of this Complaint as if more fully set forth.

25. Defendant, Allentown School District violated the Civil Rights Act.

26. Plaintiff, John Annoni, was treated differently because of his gender because Defendant, Allentown School District, placed Plaintiff, John Annoni, on Administrative Leave presuming that as a male that he was harassing female employees of Allentown School District.

27. Defendant, Allentown School District's, discriminatory actions toward Plaintiff, John Annoni, caused significant mental anguish and distress.


28. Plaintiff, John Annoni, since the aforesaid allegations, has not been able to participate in professional development and extracurricular activities.

29. Plaintiff, John Annoni, believes and therefore avers that because of the presumption of responsibility which Defendant's actions placed on him that he suffered significant and possibly irrevocable damage to his reputation within the Allentown School District and the community at large.

WHEREFORE, Plaintiff demands judgment against Defendant for an amount in excess of Fifty Thousand Dollars (\$50,000.00).

Respectfully submitted,

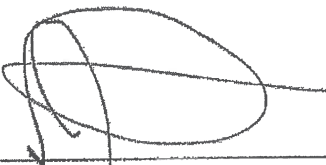
STOCK LAW

By: 
Edwin L. Stock, Esquire
Attorney for Plaintiff

VERIFICATION

I, John Annoni, the Plaintiff in the within instrument, hereby verify that the facts set forth herein are true and correct to the best of my knowledge, information and belief and that this verification is made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

Date: 2/2/2024



John Annoni